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DMS Numbered Memo 2017-05

To: County Department of Human Services Directors
County Department of Social Services Directors
County Department of Community Programs Directors
Long-Term Support Supervisors and Leads

From: Curtis J. Cunningham, Assistant Administrator
Long Term Care Benefits and Programs

A handwritten signature in cursive script, appearing to read "Curtis J. Cunningham".

Children's Long-Term Support Waiver Program Online Enrollment

Background

The Department of Health Services (DHS), Bureau of Children's Long Term Support Services (BCLTSS) is implementing an online enrollment process for the Children's Long-Term Support (CLTS) Waiver Program that county waiver agencies (CWAs) will begin using December 4, 2017. The Eligibility and Enrollment Streamlining solution (also called the Waiver Enrollment Wizard) replaces the process whereby CWAs submit paper forms containing waiver program enrollment information to BCLTSS. As of December 4, 2017, CWA staff will enter enrollment data (including new enrollments, recertifications, suspensions, and disenrollments) directly online.

Purpose

This memo serves to align CLTS Waiver Program policy and online enrollment. The policy in this memo replaces past policy. CWAs are instructed to follow existing guidance provided in the Waiver Manual and other policy documents for any topics that are not addressed in this memo.

Enrollment

CWAs remain responsible for determining eligibility based on the criteria outlined in the [Waiver Manual](#), within 45 calendar days of a referral. If an applicant is determined to be ineligible for the program, the waiver agency must send a denial notice to the family.

A child who is determined to be eligible can be enrolled in the CLTS Waiver Program through the online enrollment process when the following conditions are met:

- The child is enrolled in Wisconsin Medicaid.
- The child meets the CLTS Waiver Program functional eligibility requirements.
- The support and service coordinator (SSC) has initiated development of an individual service plan (ISP) for the child.

The enrollment effective date (i.e., start date) is the earliest date when these requirements have been met.

Waiver-funded supports and services must begin on or after the enrollment effective date. Activities that an SSC conducts to determine eligibility and enroll a participant that take place up to 90 days prior to the program start date can continue to be billed in aggregate as of the waiver enrollment effective date. Current policies continue to apply to children who are transitioning from an ineligible setting at the time of initial enrollment. No other supports or services can be backdated prior to the participant's enrollment.

Medicaid Enrollment

Online enrollment will automatically verify that waiver participants are enrolled in Medicaid. A child must be continuously enrolled in one of the [full-benefit Medicaid subprograms](#).

Since a participant must have an active source of Medicaid in order to successfully be enrolled in the waiver program, SSCs need to coordinate with agencies that determine the source of a child's Medicaid (e.g., Department of Children and Families, Income Maintenance, Katie Beckett, Social Security Administration), particularly when enrollment issues arise. CWAs must also work with the local Income Maintenance agency to ensure that every eligible child who is referred for Waiver Medicaid is enrolled in the Medicaid program.

Functional Eligibility

Online enrollment automatically verifies that waiver participants meet functional eligibility requirements. An SSC must determine and annually redetermine that each waiver participant is functionally eligible, as calculated by the CLTS Functional Screen (CLTS FS). When enrolling a child from the Children's Long-Term Support Wait List, the screen determining functional eligibility must have been completed by a certified screener within the last 12 months.

Screeners will only transfer CLTS FS results (i.e., check the box on the Functional Screen Information Access (FSIA) system's eligibility results page) when a child is found functionally eligible for the CLTS Waiver Program.

Not Functionally Eligible (NFE)

When a CLTS FS indicates that a waiver participant is not functionally eligible, it is the CWA's responsibility to ensure the accuracy of the determination prior to taking action that will result in disenrollment.

With All NFE Results

CLTS Functional Screen results can pend up to 10 calendar days before affecting enrollment, allowing time to review screens and address any issues. Additionally,

- The SSC will **not** check the box on the eligibility results page to transfer NFE results.
- DHS will review all NFE screen results for the CLTS Waiver Program and may contact a CWA with questions or further instructions.
- CWAs must work with DHS and follow the state's guidance to resolve any functional screen issues or errors.
- After 10 days, an NFE result will automatically be transferred to the online enrollment system and will initiate disenrollment for the participant.

Initial Eligibility Determination

When an SSC conducts a functional screen for a child who is applying for waiver services and the screen finds the child to be NFE for the waiver program,

- The SSC will **not** check the box on the eligibility results page to transfer the results.
- The CWA may choose to have a second screener review the screen within 10 days.
- The CWA may request that DHS (dhscltsfs@dhs.wisconsin.gov, with “NFE Review” as the subject line) review the screen as soon as possible, but within 10 calendar days, to confirm the NFE calculation.
- When NFE is confirmed for an initial application, the waiver agency will send the family a notice of denial, along with a description of the applicant’s state appeal and county grievance rights. Notice must be sent within 45 days of referral to the program.

Update or Recertification

When an SSC updates a functional screen or conducts a rescreen and finds that a child who is enrolled in the waiver program is no longer functionally eligible,

- The SSC will **not** check the box on the eligibility results page to transfer the results.
- A second screener must review the screen within 10 calendar days.
- The CWA must alert [DHS](#) (with “NFE Review” as the subject line) as soon as possible, but within 10 calendar days, when it appears the participant no longer meets functional eligibility.
- The SSC will delay disenrolling the child from the waiver program until the NFE determination is confirmed by both the second screener and DHS.
- When NFE is confirmed, the online enrollment system will automatically generate and send the family notice of termination from the program, along with a description of the participant’s state appeal and county grievance rights.

Other Programs

CWAs will rely on reports to identify when another program conducts a functional screen that finds an enrolled waiver participant to be NFE for the CLTS Waiver Program. In these instances,

- The CWA must immediately alert [DHS](#) (with “NFE Review – non-CLTS screener” as the subject line).
- An SSC must delay disenrollment and review the screen.

If the SSC determines that the NFE calculation is the result of a change made in error to a CLTS screen, they are instructed to correct the screen and case note the reason.

Alternately, if there are significant changes in the child’s circumstances resulting in the NFE calculation,

- An SSC must rescreen the child.
- If the SSC’s screen also results in an NFE determination, a second screener must review the screen and the CWA will immediately inform [DHS](#) (with “NFE Review” as the subject line).
- The SSC will delay disenrolling the child from the waiver program until the NFE determination is confirmed by both the second screener and DHS.
- When NFE is confirmed, the online enrollment system will automatically generate and send the family notice of termination from the program, along with a description of the participant’s state appeal and county grievance rights.

If a screener for the waiver program conducts a screen that finds a child NFE for another program in which they are enrolled, the CWA is instructed to immediately inform the other program's lead.

Individual Service Plan

SSCs will continue to conduct comprehensive assessments to develop each child's individual service plan, which is comprised of the ISP ([F-20445](#)) and Individual Outcomes ([F-20445A](#)) forms. The online ISP Completion Date is the date that the SSC and the participant/family agree to the services listed on the ISP. The ISP Completion Date further indicates the following:

- All of the participant's assessed needs have been addressed on the ISP through waiver-funded services or through other sources. Unpaid and informal supports are also included on the ISP.
- Waiver providers listed on the ISP meet necessary qualifications.
- The ISP adheres to CLTS Waiver Program requirements.

Online enrollment and services are not to be delayed while an SSC works to obtain the necessary signatures. An ISP must be completed with all the required signatures within 60 days of the date the SSC and family agree to the plan.

An ISP Completion Date is only required to be entered online at initial enrollment, recertification, and when a suspension ends. It is expected that ISPs will continue to be reviewed and/or updated with the participant and their family more frequently than an SSC will record in online enrollment.

Parental Payment Fees

CWAs will continue to follow current policy and procedure to calculate parental payment fees using the Worksheet for Determination of Parental Payment Limit for Children's Long-Term Supports ([F-01337](#)). A monthly amount, even when it is determined to be \$0, must be entered into online enrollment.

Changes

CWAs have 10 business days from the date a change affecting enrollment is reported to enter the change online.

Recertification

Verifying CLTS Waiver Program eligibility must be conducted annually. SSCs can complete a recertification sooner, but not later, than the last day of the month, 12 months from the enrollment effective date or the last recertification completion date.

Each participant must be rescreened annually by a certified screener. Rescreen calculations are not to be delayed as a result of waiting for collateral information if the available information (including a caregiver's verbal report) indicates ongoing eligibility. SSCs must email dhscsltsfs@dhs.wisconsin.gov as soon as possible (with "Late Rescreen" as the subject line) to inform the state when a child's functional screen will be late for an annual functional eligibility redetermination.

As with initial enrollment, entering the ISP Completion Date at recertification assures that the ISP was reviewed with the family and meets all CLTS Waiver Program requirements.

Suspend Status

When a participant resides in an ineligible setting, enrollment in the waiver program is suspended for up to 90 days. The start and end dates of a suspended enrollment are the first and last **full** days that a

participant resides in an ineligible setting. CWAs must send notice to the family that services have been suspended. Program requirements (such as rescreens, recertifications) are also suspended while an enrollment is in suspend status.

When an enrollment is suspended:

- A participant remains in active status on the days they leave and enter an eligible setting.
- Some limited services can be billed during the suspension, including:
 - Personal emergency response systems (PERS)
 - Financial management services (e.g., monthly fiscal agent fees)
 - Waiver-allowable foster care expenses
- Current policy continues to apply for billing supports that assist in the transition back to an eligible setting, including transitional support and service coordination.

As the participant transitions back to an eligible setting:

- The SSC will review the ISP with the participant and their family to ensure the correct levels of supports and services.
- The SSC will update the ISP, as needed.
- The SSC will record an updated ISP Completion Date in online enrollment.
- An automated notice confirming enrollment will be generated and sent to the family.
- The SSC will adjust the Recertification Due Date to be the last day of the month, 12 months from the enrollment or last recertification date, in order to ensure an annual review of the participant's waiver eligibility.

If a child's recertification comes due while their enrollment is suspended, the CWA must contact [DHS](#) with "Recert due during suspension" as the subject line. The SSC will complete the [recertification](#) when the suspension ends. Under these circumstances, the next recertification due date will be the last day of the month, 12 months from the date the recertification was completed.

Disenrollment

There are only two reasons for disenrolling a participant from the CLTS Waiver Program:

- It is verified that the child no longer meets CLTS Waiver Program eligibility requirements.
- The family communicates that they do not want to receive services through the waiver program.

Automated Disenrollment and Reenrollment

Online enrollment will automatically initiate disenrollment when any one of the following conditions exists:

- Loss of Medicaid enrollment
- Loss of functional eligibility
- Late annual rescreen
- The participant ages out of the waiver program

Automation requires that, in order to prevent inadvertent program disenrollment, CWAs must both:

- Use reports to track program enrollments and disenrollments.
- Work closely with entities that manage Medicaid enrollment (e.g., Department of Children and Families, Income Maintenance, etc.) and/or affect functional eligibility (e.g., Katie Beckett, Comprehensive Community Services, etc.).

If one source of Medicaid ends, SSCs are required to explore whether another source is appropriate (including Waiver Medicaid) and work to provide seamless coverage and enrollment for waiver program participants.

When waiver enrollment ends due to one of the automated eligibility verification processes and the issue is resolved within three months (i.e., reenrolled in Medicaid, determined to meet functional eligibility, rescreen completed), the participant will be reenrolled with a backdate up to the first of the month, three months prior. An automatic disenrollment notice is generated when a participant's enrollment ends, and the participant will receive an automatic notice when they are reenrolled. When a participant is automatically reenrolled, the recertification date continues to be calculated 12 months from the initial enrollment or most recent recertification.

CWAs must inform [DHS](#) immediately upon learning that a family has appealed a decision to disenroll a participant from the waiver program.

A family will need to begin a new CLTS Waiver Program application if a past participant has been disenrolled for longer than 90 days.

County Transfer

CWAs are instructed to follow current policies and procedures when a participant moves to another county to ensure a seamless transition. The sending county must end the online enrollment before the receiving county can enter a new enrollment.

Transition

When a participant's enrollment ends and they will no longer receive waiver-funded supports and services (e.g., due to aging out, confirmed NFE, etc.), the SSC must work with the family to discuss and identify:

- Health insurance options.
- Other programs and community resources that may provide supports and services.

Reports

CWAs must use available online reports to track and verify the accuracy of enrollments and disenrollments, and to plan for conducting timely recertifications.

Notices

Notices are automatically generated and sent to families upon program enrollment and disenrollment. CWAs will no longer send locally-generated waiver program enrollment and disenrollment letters to families or copies of the notices to DHS.

CWAs must continue sending families notices for:

- Denials at initial application
- Suspension of services
- Reductions or terminations in services
- Denials of type of waiver support or service, or of qualified service provider

Forms

Prior to online enrollment, CWAs submitted forms to DHS to enroll and recertify participants and to report changes. CWAs are now required to maintain enrollments (i.e., new enrollments, changes, recertifications, suspensions, and disenrollments) exclusively online.

Effective December 4, 2017, the following forms are obsolete, and CWAs are instructed to discontinue using and submitting:

- CLTS Waiver Eligibility Verification Step 1 (F-21080)
- CLTS Waiver Eligibility Verification Step 2 (F-21080A)
- CLTS Waivers Recertification Checklist (F-21078)
- CLTS Waivers Change Report (F-00852)
- CLTS Waivers Slot Change Request (F-00102)
- Notification of Waiver Program Termination (F-22638)

CWAs will also discontinue sending ISPs to DHS, except upon request.

Assistance

CWAs are encouraged to direct any questions to dhsclts@dhs.wisconsin.gov or to the [children's services specialist \(CSS\)](#) assigned to their county.